

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

JEFFREY HUNT

Case No. 20-MJ-1527

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 17, 2020 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section*

18 U.S.C. § 922(g)(1)

*Offense Description*

Felon in possession of firearm

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet./s/ Ryan Rooney*Complainant's signature*Ryan Rooney, ATF Special Agent*Printed name and title*

Sworn to before me and signed in my presence.

Date: 10/15/2020/s/ David R. Strawbridge*Judge's signature*City and state: Philadelphia, PennsylvaniaDavid R. Strawbridge, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Ryan Rooney, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I, Ryan W. Rooney, am a Special Agent for the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been so employed since March 2014. I am currently assigned to ATF Philadelphia Group VII, which is a Firearms Enforcement Group, whose primary responsibilities include investigating violent crime through the interdiction of firearms being possessed or used by violent criminals in Philadelphia, Pennsylvania. During my career as an ATF Agent, I have applied for and executed Federal search warrants and seized evidence in accordance with the probable cause set forth in the affidavits. I have led investigations related to firearms trafficking and I have arrested individuals in violation of Federal firearms laws; I am familiar with evidence needed in a criminal complaint's affidavit to establish probable cause.

2. The information contained in this affidavit is known to me personally or has been provided to me by other law enforcement officers, or individuals assisting law enforcement officers, as indicated below. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause to secure authorization to arrest Jeffrey HUNT, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause.

### **PURPOSE OF AFFIDAVIT**

3. This affidavit is provided in support of a Criminal Complaint and Arrest Warrant charging Jeffery HUNT with felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1).

### **FACTS ESTABLISHING PROBABLE CAUSE**

4. I reviewed Philadelphia Police Department (PPD) reports which revealed that on August 17, 2020, at approximately 12:46 a.m., PPD Officers responded to 612 Franklin Place for a report of a disturbance. Upon arrival, PPD Officers were met by the complainant who stated that a male, later identified as Jeffrey HUNT, entered her home without permission through the front window and refused to leave. The officers entered the complainant's home and found HUNT asleep on the couch. As the Officers escorted HUNT out of the residence and told him not to go back inside the residence, a PPD Officer observed a black handgun in the back pocket of HUNT's pants. Both officers attempted to grab HUNT, but he fled. After a brief pursuit, HUNT was tazed and he fell to the ground. Afterward, the officers recovered the firearm, a black Smith & Wesson, Model Bodyguard, .380 caliber pistol, bearing serial number KFE3857, loaded with six live round of ammunition, from HUNT. HUNT was also in possession of 10 pink jars containing a white, chunky substance consistent with crack cocaine and one solid rock of a substance also consistent with crack cocaine – all of which field tested positive for cocaine. HUNT was arrested and charged locally with Burglary and Violation of the Uniform Firearms Act (VUFA).

5. ATF investigators learned that the aforementioned Smith & Wesson pistol was reported stolen from a vehicle in Maiden, North Carolina on August 1, 2019, and the Maiden Police Department documented the theft on Incident Report # INC-2019-08-1

6. Based on my training and experience as an ATF Agent, your affiant avers that the aforementioned Smith & Wesson, Model Bodyguard, .380 caliber pistol, bearing serial number KFE3857, is a “firearm” as defined in 18, U.S.C. § 921(a)(3). Additionally, an ATF expert in the area of interstate nexus analysis has determined this firearm was manufactured outside of the Commonwealth of Pennsylvania. Therefore, by virtue of its presence in Pennsylvania on the date it was seized from HUNT, the firearm traveled in interstate or foreign commerce.

7. Additionally, I determined that HUNT is a previously convicted felon and is prohibited from possessing firearms under Federal law. He has been convicted of the following felony:

a. On September 9, 2017, HUNT was charged by the PPD in CP-51-CR-0008846-2017, with manufacture, delivery, or possession with intent to manufacture or deliver a controlled substance; he pled guilty and was sentenced to 12 months’ imprisonment.

The certified records for CP-51-CR-0008846-2017 show that the defendant was aware that this conviction was for a crime punishable by imprisonment for a term of exceeding one year.

**CONCLUSION**

8. Based on the above information, and my experience and training as an ATF special agent, there is probable cause to believe that Jeffery HUNT violated 18 U.S.C. § 922(g)(1) and I therefore request that a warrant issue for his arrest.

Respectfully submitted,

/s/ Ryan Rooney  
Ryan Rooney  
ATF Special Agent

Subscribed and sworn to  
before me this 15th day  
of October 2020,

/s/ David R. Strawbridge  
HON. DAVID R. STRAWBRIDGE  
United States Magistrate Judge